

File No.: 49877  
MORTON & CRAIG, LLC  
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(856)866-0100  
Attorney for Ally Financial  
JM5630\_\_\_\_\_

UNITED STATES  
BANKRUPTCY COURT FOR  
THE DISTRICT OF NEW  
JERSEY

IN RE:  
BRIAN K. STARKE  
DINA STARKE

CHAPTER 13  
CASE NO: 18-12205(JNP)  
HEARING DATE: 1-7-2020

NOTICE OF MOTION OF  
ALLY FINANCIAL TO  
MODIFY THE AUTOMATIC  
STAY

To:

Brian and Dina Starke  
113 Rittenhouse Drive  
Deptford, NJ 08096  
Debtors

Brad J. Sadek, Esq.  
1315 Walnut Street  
Suite 502  
Philadelphia, PA 19107  
Attorney for the debtors

Isabel C. Balboa  
Cherry Tree Corporate Center  
535 Route 38, Suite 580  
Cherry Hill, NJ 08002  
Trustee

U.S. Trustee, US Dept of Justice  
Office of the US Trustee  
One Newark Center, Suite 2100  
Newark, NJ 07102

John R. Morton, Jr., Esquire, attorney for Ally Financial, has filed papers with the Court for relief from the automatic stay to permit Ally Financial to repossess and sell the motor vehicle(s) described in the attached pleadings. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult with one.** If you do not want the Court to grant the relief sought, or if you want the Court to consider your views on the motion, then no later than seven (7) days before the hearing date, you or your attorney must:

File with the Court a written request for a hearing (or, if the Court requires a written response, an answer, explaining your position) at:

United States Bankruptcy Court  
1 John F. Gerry Plaza  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

If you mail your (request) (response) to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

John R. Morton, Jr., Esquire  
110 Marter Avenue, Suite 301  
Moorestown, NJ 08057

TAKE FURTHER NOTICE that the facts movant relies upon, as set forth on the accompanying certification, and the basis for relief from the automatic stay, do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary in the Court's consideration of the within Motion, and TAKE FURTHER NOTICE that oral argument is hereby not requested.

**Attend the hearing scheduled to be held on January 7, 2020 at 10 a.m. in Courtroom #4C, United States Bankruptcy Court, 1 John F. Gerry Plaza, 4<sup>th</sup> & Cooper Streets, Camden, New Jersey 08101.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order.

Date: 12-12-2019

/s/ John R. Morton, Jr., Esquire  
John R. Morton, Jr., Esquire  
Attorney for Ally Financial